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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)

Federal-State Joint Board on Universal Service)

Forward-Looking Mechanism for High)
Cost Support for Non-Rural LECs)

and)

Federal-State Joint Board on Universal Service)

Access Charge Reform)

CC Docket No. 96-45

CC Docket No. 97-160

CC Docket No. 96-45

CC Docket No. 96-262

**NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS
REQUEST FOR AN EXTENSION OF COMMENT PERIODS**

Pursuant to Federal Communications Commission ("FCC" or "Commission") Rule 1.46, 47 C.F.R. § 1.46 (1997), the National Association of Regulatory Utility Commissioners ("NARUC"), through counsel, respectfully requests that the FCC grant its member agencies an extension of time to file comments and reply comments in the above-captioned proceedings.

These proceedings ask for comments on matters of great importance to the implementation of a federal non-rural, high cost universal service program. Preparing such comments dictates that interested parties fully analyze the FCC's proposals, which requires the commitment of substantial time and computing resources. For the reasons discussed in more detail infra, NARUC requests that its members be provided additional time to perform the analyses needed to provide cogent responses to the issues raised in these proceedings.

In support of this request, NARUC states as follows:

DISCUSSION

On May 28, 1999, the FCC released two further notices of proposed rulemaking ("FNPRM") associated with the adoption of a federal non-rural, high cost universal service program. In the Inputs FNPRM, the FCC asks for comment on input values for its universal service forward-looking cost proxy model for non-rural carriers. In the Implementation FNPRM, the FCC offers proposals concerning implementation issues for a federal non-rural, high cost universal service program.

Both further notices raise issues that are critical to NARUC's members as they will dramatically impact their ability to assure universal services and the continued provision of telecommunications services to high cost areas in each of their jurisdictions. The Telecommunications Act of 1996 requires, at a minimum, a federal mechanism to preserve and advance universal service. Both further notices raise issues that go directly to the sufficiency of the support that will come from the support program eventually adopted and implemented by the FCC. Accordingly, it is imperative that interested parties be given an adequate opportunity to test the FCC's proposed inputs and input assumptions, comment on those inputs and input assumptions, and comment on the consequences of applying the inputs and input assumptions to the implementation proposals set forth in the Implementation FNPRM.

NARUC endorses the extensions requested last week by the United States Telephone Association. NARUC joins USTA in asking that the due date for comments on issues raised by the Inputs FNPRM be extended to August 2, 1999, and that the due date for reply comments be extended to September 2, 1999. We also join USTA in requesting that the due date for comments on the issues raised by the Implementation FNPRM be extended to August 16, 1999, and that the due date for reply comments be extended to September 16, 1999.

NARUC respectfully suggests the request for additional time to provide comments and replies is necessary. During the recent Friday June 18th NARUC Ad Hoc Telecommunications conference call, many Commissioners and their staffs suggested that the complexity and breadth of the issues raised make it difficult, if not impossible, for most commissions to examine the most recent model and inputs and author relevant comments in the comment periods provided.

The Inputs FNPRM raises fundamental issues concerning the validity of the FCC's current proposed forward-looking cost proxy model that must be fully considered by State agencies before responses to the issues raised by the Implementation FNPRM can be prepared and presented. The issues on which the FCC has requested comment in the Inputs FNPRM are presented on 16 pages, and commenting parties are asked to place cost model data on the record in support of their specific responses. Furthermore, the last iteration of the cost proxy model required over 200 computer hours to run, from beginning to end, using the Commission's default values. This equates to over eight days. The FCC has requested that commenting parties "frame their comments to recognize the close relationship between the issues discussed in" the Inputs FNPRM and Implementation FNPRM. NARUC's members need additional time in order to be able to submit complete and responsive comments and reply comments in these proceedings. Interested parties must be provided adequate time to respond to these data intensive further notices at this critical stage of these proceedings to assure the FCC has a complete record upon which to base its decision. In light of the time that it has taken to bring this proceeding to this point, the additional time requested for comments and reply comments is *de minimus* relative to the overall length of the proceeding.

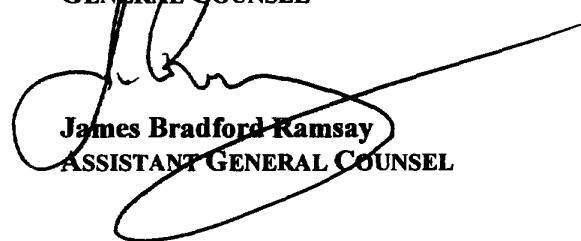
CONCLUSION

For the reasons stated above, NARUC respectfully request that the FCC grant this request for extension of time.

Respectfully submitted,



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June 21, 1999